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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Proposed Reallocation of 420 to 430 MHz and
440 to 450 MHz from the Federal Government to
The Private Mobile Radio Service

RM 9267

May 26, 1998

I would like to tell you how the 420-430 & 440-450 MHz bands are used in Texas. In Dallas we have several Amateur Television transmitters that output in the 420-430 MHz with AM Modulation. Some of these transmit weather radar from the local TV stations to enhance the RACES storm spotter teams during bad weather. There are also Amateur Television transmitters in East Texas, Central Texas & Houston Texas.

There are several groups of Amateurs that have linked repeaters together to form a network. Some of these systems are also used for storm spotting information back to the National Weather Service through the RACES groups. The links for these full duplex repeaters are in the 420-430 MHz spectrum. Most are on Vertical polarity with the television transmitters on Horizontal polarity. There are some conflicts between the AM television and FM links but for the most part they share the spectrum with minimal interference.

I have been involved with one of the linked repeater systems from its inception back in the mid 1970's. We currently have 49 full duplex repeaters in Armadillo

Intertie Inc. and Intertie, Inc. all connected together around the state of Texas. That's two channels, 2 radios, 2 duplexers (one at each end), 2 runs of feed line, and 2 antenna systems per link. These links tie together 50 repeaters on 8 channels between 443.5 & 443.975 MHz. The system is controlled by a microprocessor controller designed & built by the Armadillo Intertie group. This is by far the largest group of linked repeaters in the state of Texas. There are several other groups with smaller systems.

The system of linked repeaters as I have described in Texas are connected to affiliated groups going west from Texas to California. It is possible to talk from the Gulf of Mexico with a handheld radio to another handheld on the Pacific coast. These connections are all made through full duplex links in the 420-430 Mhz band.

I have described the above systems to show there is a lot of activity in 420-430 MHz that is not publicly known. In Texas we do have a database that shows all the coordinated 420-430 MHz systems. There is also data for the 440-450 MHz repeater systems.

I can say that the Amateur community and the Federal Government have shared this spectrum in Texas with little or no problems. I don't see this marriage with the PMRS. The Amateur community has been attempting to use the 902-928 MHz spectrum on a shared basis with other licensed and unlicensed services. It

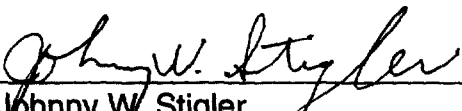
simply is not a viable alternate spectrum in the large cities with spread spectrum, cordless telephones, Teletrac, etc.

Now to the cost issue of moving these well established networks of Amateur repeaters. The fair cost of moving the existing amateur linked system (as described previously) to an Equivalent spectrum is quite high. Assuming we would stay in the general area of 420-450 MHz I could see spending \$200K to \$500K on moving to different frequencies. This is only for crystals, antennas & tower work. This is simply an expenditure that our group could not afford. We are a dues paying organization but only to cover the yearly expenses of utilities, liability insurance, maintenance & some expansion.

In summary I don't see the Amateur community being able to share this spectrum on a secondary basis with PMRS. We have coordination bodies in the Amateur community that strive to assign frequencies that will not conflict with other Amateur users. I urge you to consider the above described use of the 420-430 & 440-450 MHz as a viable use. This band is used by the more technical group of Amateurs and much of it is in use by converted older commercial equipment. The Armadillo Intertie was formed by a small group of individuals that started to move around the state. In a nut shell you could say it was friends wanting to talk to friends that had moved apart. We now have several hundred friends that can all talk to each other and have fun with the hobby. Some may not think spending 20 hours per link radio, a day or so at a remote site installing

feedline & antennas, burning lots of gasoline to get there a fun day. When the persons in Austin, Houston, or Midland Texas communicate with each other and a person in Dallas doesn't know they are not local, the work is a success. In the event of a disaster we could pull this network together for what ever group needed communications. I can see many holes in the lengthy LMCC Proposal and would hope you consider all the Amateurs using the above mentioned frequencies.

Respectfully submitted,
Johnny W. Stigler WA5ZRQ
2617 Tallow Dr.
Euless, TX 76039
(214) 977-6475



Johnny W. Stigler
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